

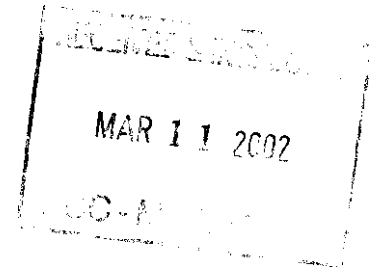
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EX PARTE OR LATE FILED

Columbia Institute for Tele-Information

Columbia University Business School
1A Uris Hall
3022 Broadway
New York, NY 10027-6902

October 31, 2001



Magalie Roman Salas
Secretary, Federal Communications Commission
445 Twelfth Street, S.W.
TW-B204
Washington, D.C. 20554

RE: NOTICE OF EX PARTE COMMUNICATION
CC Docket No. ~~01-02~~ (Unified Inter-carrier Compensation)

Dear Secretary Roman Salas:

On Thursday, October 18 the Columbia Institute for Tele-Information (CITI) held an invitation-only workshop in Washington, D.C. on the topic of carrier-to-carrier interconnection compensation. CITI is an academic research institute affiliated with Columbia University's Business School.

Since members of the FCC staff attended the workshop and the subject of the workshop is related to the two above-referenced dockets, out of an abundance of caution CITI is filing this notice of ex parte meetings (an original and three copies) on behalf of CITI and the workshop attendees.

Attached to this letter are:

1. the agenda for the workshop
2. a list of attendees

The workshop discussion generally followed the agenda. As a way to synthesize the discussion, towards the end of the workshop participants were invited to make a "proposal" that might resolve at least one important aspect of the overall "interconnection compensation" issue. Seven "proposals" were offered for discussion:

1. **"Muddling through": maintain the status quo** by continuing ad hoc regulatory proceedings and resolution of specific disputes.

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2. **Bill & Keep**, as generally outlined in the Commission's NPRM.
3. **Access Charge-Recip Comp Convergence**, where CLEC-ILEC reciprocal compensation would continue in accordance with the FCC's recent reciprocal compensation order (subject to State PUC modification within the FCC prescribed bands) until a post-CALLS arrangements for access charge interconnection is judged (by CLECs) to also be suitable for reciprocal compensation.
4. **Deregulate Subscriber Line Charges** to allow (but not require) ILECs to attempt to offset very low (even possibly non-existent) carrier-to-carrier interconnection charges, with continued availability of low-cost UNE loops as a competitive "cap" on the growth of the SLC.
5. **A New "St. Louis Plan"** that permits States to "experiment" with different interconnection pricing systems (within FCC-specified guidelines) so that the FCC can eventually adopt a unified system based on the results of the State experiments.
6. **A "Combination of the Above"** in which intrastate access charges would move toward very low reciprocal compensation rates through State "experiments" (such as access charge and retail toll rate deaveraging) and ILECs would have an opportunity to offset the lower access charge revenues through higher SLCs.
7. **Keep CMRS-ILEC out of the wireline interconnection dispute:** CMRS should have low rates under negotiated arrangements not subject to "pick and choose" by other carriers and be solely under FCC jurisdiction.

There was lively debate among attendees with respect to these "proposals," but no strong consensus in support of any one of them. It was generally agreed, however, that interconnection rates of every sort are inevitably going to become so low that the practical difference between "Bill & Keep" and forward looking incremental charges (particularly if flat-rated) is so insignificant that it is not worth spending much time or effort on the debate.

Sincerely,



Robert C. Atkinson
Executive Director
Columbia Institute for Tele-Information

cc: Attendees (see attached list)
Paul Moon – CCB
Qualex International (copy contractor)

PROPOSED AGENDA
CITI INTERCONNECTION PRICING WORKSHOP

October 18,2001

CONVENE at 9:30 am

1. Introductions and groundrules
2. News from the FCC
3. Is there any question that the existing "interconnection pricing" system is "broken"? Would anyone like to defend it?
4. Did the NPRM identify all the "problems" associated with the current system? Can we prioritize the problems? (i.e., which is the most significant "arbitrage" problem?)
5. Discussion of key issues, such as:
 - a) A "unified" system applicable to all traffic, or just ISP traffic?
 - b) Transport and interconnection points...who decides? under what rules or guidelines?
 - c) Must "subsidies" and "Universal Service" issues be resolved simultaneously with revision of "interconnection pricing"?
 - d) Rate structures and rate levels... what are the statutory requirements and economic principles?
6. Are there any "interim" or "partial" interconnection pricing reforms that would resolve some issues and could be implemented quickly with wide support?
7. Next steps?

ADJOURN by 4:30 pm

INTERCONNECTION PRICING WORKSHOP**COLUMBIA
BUSINESS
SCHOOL****OCTOBER 18, 2001**

| LAST NAME | FIRST NAME | AFFILIATION |
|------------------|-------------------|--|
| Altschul | Michael | CTIA |
| Askin | Jonathan | ALTS |
| Atkinson | Robert | CITI |
| Brinkmann | Karen | Latham & Watkins |
| Canis | Jonathan | Kelly, Drye |
| Clarke | Rich | AT&T |
| Degraba | Pat | Charles River Associates |
| Epstein | Gary | Latham & Watkins |
| Halprin | Bert | Halprin Temple Goodman & Maher |
| Harris | Charon | Verizon |
| Hultquist | Hank | WorldCom |
| Ilail | Sherille | Federal Communications Commission |
| Jackson | Jane | Federal Communications Commission |
| Jones | Thomas | Willkie Farr & Gallagher |
| Jordan | Stacy | FCC |
| Jordan | Whit | BellSouth |
| Kent | Linda | United States Telecom Association |
| Lee | Jonathan | Competitive Telecommunications |
| Leeper | Sarah | CTIA |
| Levin | Joseph | FCC |
| Lubin | Joel | AT&T |
| Mayo | John | Georgetown University |
| Metzger | Dick | FOCAL Communications |
| Moy | Norina | Sprint |
| Pelcovits | Michael | WorldCom |
| Pies | Staci | Level 3 |
| Ramsay | Brad | NARUC |
| Sclater | Michelle | SBC |
| Staihr | Brian | Sprint |
| Stockdale | Don | Federal Communications Commission |
| Sumpter | John | Pac-West Telecomm. |
| Sywenki | Pete N. | Sprint |
| Vadas | Gregory | FCC |
| Vasington | Paul | Massachusetts Dept of Public Utilities |
| Weller | Dennis | Verizon |
| Whitlock | Erik | Cable & Wireless USA |
| Wiggins | Stanley | FCC |